

EXHIBIT G

From: Breslin, Mike <mbreslin@kilpatricktownsend.com>
Sent: Friday, October 16, 2020 2:37 PM
To: Gallo, Joseph
Cc: Dowdy, Joe; Wiley, Adam; LaVigne, Christopher
Subject: RE: Williams v AT&T meet and confer

Joe –

Quick update: my client is checking to ensure the folks we've ID'd re: security measures can cover both the retail store and customer care channels. If not, we'll have to add another person to the list. I'm waiting to hear back and will have the initial list once we pin this down.

Thanks,
-Mike

Michael Breslin
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From: Breslin, Mike
Sent: Wednesday, October 14, 2020 5:34 PM
To: 'Gallo, Joseph' <Joseph.Gallo@withersworldwide.com>
Cc: Dowdy, Joe <JDowdy@kilpatricktownsend.com>; Wiley, Adam <AWiley@kilpatricktownsend.com>; LaVigne, Christopher <Christopher.LaVigne@withersworldwide.com>
Subject: RE: Williams v AT&T meet and confer

Joe –

We've ID'd some of the individuals already and are waiting on our client to confirm one (or maybe two) more person(s). I'd anticipate getting you the names and descriptions before the weekend.

Thanks,
-Mike

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From: Gallo, Joseph <Joseph.Gallo@withersworldwide.com>
Sent: Wednesday, October 14, 2020 5:23 PM
To: Breslin, Mike <mbreslin@kilpatricktownsend.com>
Cc: Dowdy, Joe <JDowdy@kilpatricktownsend.com>; Wiley, Adam <AWiley@kilpatricktownsend.com>; LaVigne,

Christopher <Christopher.LaVigne@withersworldwide.com>

Subject: RE: Williams v AT&T meet and confer

Mike:

Following up on this. Where is the list of individuals we discussed (in response to Interrogatory No. 15)? It probably makes sense for us to have that list before we speak again, and it would seem relatively simple for you to provide it to us. Please let us know, thanks.

Joe

Joseph Gallo

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From: Breslin, Mike [<mailto:mbreslin@kilpatricktownsend.com>]

Sent: Tuesday, October 6, 2020 2:20 PM

To: Gallo, Joseph <Joseph.Gallo@withersworldwide.com>

Cc: Dowdy, Joe <JDowdy@kilpatricktownsend.com>; Wiley, Adam <AWiley@kilpatricktownsend.com>; LaVigne, Christopher <Christopher.LaVigne@withersworldwide.com>

Subject: RE: Williams v AT&T meet and confer

Thanks, Joe. I agree we should exchange information on what searches have been performed. We have done the searches you reference below and plan to discuss further searches with you, with the identification of potential AT&T custodians we've been discussing below as a step in that direction. On our next call let's plan on sharing what searches have been performed on both sides and what additional searches the parties think are appropriate.

Best,
-Mike

Michael Breslin

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From: Gallo, Joseph <Joseph.Gallo@withersworldwide.com>
Sent: Tuesday, October 6, 2020 1:37 PM
To: Breslin, Mike <mbreslin@kilpatricktownsend.com>
Cc: Dowdy, Joe <JDowdy@kilpatricktownsend.com>; Wiley, Adam <AWiley@kilpatricktownsend.com>; LaVigne, Christopher <Christopher.LaVigne@withersworldwide.com>
Subject: RE: Williams v AT&T meet and confer

Thanks for the response Mike. Those expert dates look right to me as well.

I understand your clarification regarding the list of individuals. As mentioned on the phone, we will look at the list you provide, but we are not agreeing to limit the scope of that interrogatory (I don't think you meant to imply that we were, but figured I would clarify that point).

I am still a bit unclear on the status of searches for communications that AT&T has done to date. Let me ask it another way: to date, has AT&T conducted any searches for potentially responsive communications aside from (1) communications directly related to Mr. Williams' account; and (2) communications at the AT&T Board of Directors Level? I thought I asked you that question yesterday and you answered in the negative, but obviously if AT&T has performed additional searches for communications, please correct me and explain what other searches have been done. I think it would be helpful to understand what AT&T has done so far, so our next meet and confer about additional searches is transparent and productive. Thanks.

Regards,
Joe

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From: Breslin, Mike [<mailto:mbreslin@kilpatricktownsend.com>]
Sent: Tuesday, October 6, 2020 12:51 PM

To: Gallo, Joseph <Joseph.Gallo@withersworldwide.com>
Cc: Dowdy, Joe <JDowdy@kilpatricktownsend.com>; Wiley, Adam <AWiley@kilpatricktownsend.com>; LaVigne, Christopher <Christopher.LaVigne@withersworldwide.com>
Subject: RE: Williams v AT&T meet and confer

Joe –

This looks correct except: (1) we are compiling a list of individuals consistent with the offer in our Sept. 18, 2020 letter to identify the people we believe are most knowledgeable about the subjects we presume you are interested in, since you indicated on the call yesterday that you'd like us to compile and produce those names, and this is an effort to compromise subject to AT&T's objections to Rog 15; (2) we have searched for potentially responsive communications beyond those directly related to Mr. Williams' account, including documents and communications at the AT&T Board of Directors Level as plaintiff requested.

Let me discuss the discovery extension with my client and I'll get back to you. I understand you're proposing the following changes (let me know if incorrect):

- Plaintiff's expert disclosure = November 16
- Defendant's expert disclosure = December 16
- Rebuttal disclosures = January 18 (the 16th is a Saturday)

Thanks,
-Mike

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From: Gallo, Joseph <Joseph.Gallo@withersworldwide.com>
Sent: Tuesday, October 6, 2020 11:51 AM
To: Breslin, Mike <mbreslin@kilpatricktownsend.com>
Cc: Dowdy, Joe <JDowdy@kilpatricktownsend.com>; Wiley, Adam <AWiley@kilpatricktownsend.com>; LaVigne, Christopher <Christopher.LaVigne@withersworldwide.com>
Subject: RE: Williams v AT&T meet and confer

Mike, per our discussion, see below for a summary of how we left things on yesterday's call. If you have a different recollection, please let me know.

- Plaintiff does not agree to limit the scope of any of its requests.
- AT&T does not waive any of its objections to the requests.
- You told us yesterday that AT&T has compiled a list of individuals responsive to Interrogatory No. 15, that AT&T has not yet produced that list, and that AT&T will produce that list shortly.
- You told us yesterday that AT&T has searched for additional documents to include in a supplemental production, and that AT&T intends to make that supplemental production this week.
- You told us yesterday that AT&T is not intending to include any communications in its supplemental production. You told us yesterday that AT&T has not yet searched for any potentially responsive communications, aside from communications directly related to Mr. Williams' SIM swaps.

- You told us yesterday that you will confer with AT&T to discuss potential additional document and communication searches, and contact me (hopefully by later this week or early next week) to discuss those additional searches.

Regarding the issue of expert disclosure deadlines, as discussed, our position is that expert disclosure is premature at this stage because we believe that there is substantial outstanding discovery that Plaintiff is entitled to receive from AT&T. Accordingly, we propose a one month extension of the existing expert disclosure deadlines for now, and that the parties see how discovery progresses in the next month before discussing the necessity of further extensions. Please let us know your response to this proposal as soon as you confer with your client. Thank you.

Regards,
Joe

Joseph Gallo

Senior Associate

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From: Gallo, Joseph

Sent: Monday, October 5, 2020 4:10 PM

To: 'Breslin, Mike' <mbreslin@kilpatricktownsend.com>

Cc: Dowdy, Joe <JDowdy@kilpatricktownsend.com>; Wiley, Adam <AWiley@kilpatricktownsend.com>; LaVigne, Christopher <christopher.lavigne@withersworldwide.com>

Subject: RE: Williams v AT&T meet and confer

It seems like people were having some issues with Skype, so please use the dial-in below:

participant access code: 10 55 088#

Toll Free:

United States: +1 (866) 499-2813

Toll:

United States: +1 (312) 380 0428

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From: Breslin, Mike [<mailto:mbreslin@kilpatricktownsend.com>]

Sent: Friday, October 2, 2020 11:15 AM

To: Gallo, Joseph <Joseph.Gallo@withersworldwide.com>

Cc: Dowdy, Joe <JDowdy@kilpatricktownsend.com>; Wiley, Adam <AWiley@kilpatricktownsend.com>; LaVigne, Christopher <Christopher.LaVigne@withersworldwide.com>

Subject: RE: Williams v AT&T meet and confer

That works for us. Thanks.

Michael Breslin

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From: Gallo, Joseph <Joseph.Gallo@withersworldwide.com>

Sent: Friday, October 2, 2020 9:14 AM

To: Breslin, Mike <mbreslin@kilpatricktownsend.com>

Cc: Dowdy, Joe <JDowdy@kilpatricktownsend.com>; Wiley, Adam <AWiley@kilpatricktownsend.com>; LaVigne, Christopher <Christopher.LaVigne@withersworldwide.com>

Subject: RE: Williams v AT&T meet and confer

How about 4pm ET/1pm PT? If that works, I will send a calendar invite with dial-in information. Let me know, thanks.

Joe

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From: Breslin, Mike [<mailto:mbreslin@kilpatricktownsend.com>]

Sent: Thursday, October 1, 2020 8:05 PM

To: Gallo, Joseph <Joseph.Gallo@withersworldwide.com>

Cc: Dowdy, Joe <JDowdy@kilpatricktownsend.com>; Wiley, Adam <AWiley@kilpatricktownsend.com>; LaVigne, Christopher <Christopher.LaVigne@withersworldwide.com>

Subject: RE: Williams v AT&T meet and confer

Joe –

Monday is fairly open for us. What time do you propose? FYI, Adam is on Pacific Time.

Thanks,

-Mike

Michael Breslin

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From: Gallo, Joseph <Joseph.Gallo@withersworldwide.com>

Sent: Thursday, October 1, 2020 11:34 AM

To: Breslin, Mike <mbreslin@kilpatricktownsend.com>

Cc: Dowdy, Joe <JDowdy@kilpatricktownsend.com>; Wiley, Adam <AWiley@kilpatricktownsend.com>; LaVigne, Christopher <Christopher.LaVigne@withersworldwide.com>

Subject: Williams v AT&T meet and confer

Mike:

We are in receipt of the attached letter from your firm, and we do not believe it addresses the deficiencies in AT&T's discovery responses and document production. We would like to set up for a meet and confer call. What is your availability on Monday and Tuesday of next week for a call? Please let us know, and we can get something on the calendar. Thank you.

Regards,

Joe

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